

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SHEA DEVELOPMENT CORP., BRAVERA,  
INC., and IP HOLDING OF NEVADA CORP.

Plaintiffs,

Civil Action No.: 07 CV 11201 (DLC)

-against-

CHRISTOPHER WATSON and  
ELIZABETH ANNE CONLEY

Defendants

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**NOTICE OF MOTION OF DEFENDANT ELIZABETH ANNE CONLEY TO DISMISS  
FOR LACK OF PERSONAL JURISDICTION; OR IN THE ALTERNATIVE, MOTION  
TO STAY AND REFER ALL CLAIMS TO ARBITRATION; OR IN THE  
ALTERNATIVE, MOTION FOR TRANSFER OF VENUE TO SOUTH CAROLINA.**

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law, and the Affidavit of Elizabeth Anne Conley, sworn to on January 25, 2008, and upon all the pleadings and prior proceedings heretofore had, served and/or filed herein, Defendant Elizabeth Anne Conley, by her undersigned counsel, will move this Court, before the Honorable Denise L. Cote, U.S.D.J., S.D.N.Y., located at the United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and time to be determined by the Court, for an order:

- a) dismissing the claims brought by Shea Development Corp., Bravera, Inc., and IP Holding of Nevada Corp., filed December 12, 2007 as to Defendant Elizabeth Anne Conley, pursuant to Fed.R.Civ.P. 12(b)(2) for lack of jurisdiction over the person;
- b) in the alternative, staying the action in this case, and referring to arbitration all claims brought by Shea Development Corp., Bravera, Inc., and IP Holding of Nevada Corp., filed December 12, 2007, pursuant to 9 U.S.C. § 3;
- c) in the alternative, transferring the claims brought by Shea Development Corp., Bravera, Inc., and IP Holding of Nevada Corp., filed December 12, 2007, to the U.S. District Court of South Carolina, Charleston Division, pursuant to Fed.R.Civ.P. 12(b)(3) based on improper venue;

d) granting such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to Local Civil Rule 6.1(b)(2) of the Local Rules of the United States District Court for the Southern District of New York, any opposing affidavits and answering memorandum of law shall be served within ten business days after service of the moving papers.

Respectfully submitted

Derfner & Gillett, LLP

S/ David P. Gillett  
Donald A. Derfner (DD 0696)  
David P. Gillett (DG 5305)  
600 Third Avenue, 26<sup>th</sup> Floor  
New York, New York 10016  
(212) 697-8100

Terry Ann Rickson  
Anne E. Mjaatvedt  
102 Wappoo Creek Drive, No. 8  
Charleston, South Carolina 29412  
(843) 722-1500  
(Application for Admission Pro Hac Vice pending)

Allan R. Holmes  
Gibbs & Holmes  
171 Church Street, Suite 110  
Charleston SC 29402  
(843) 722-0033  
(Application for Admission Pro Hac Vice pending)

ATTORNEYS FOR DEFENDANT  
ELIZABETH ANNE CONLEY

New York, New York  
January 28, 2008